

EXHIBIT D

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Co-Lead Counsel for Plaintiffs

[Additional counsel appear on signature page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN MATEO

IN RE RIPPLE LABS INC. LITIGATION

) Lead Case No. 18-CIV-02845

This Document Relates To:

) (Consolidated with Case No. 18-CIV-03332)

ALL ACTIONS.

) CLASS ACTION

) NOTICE OF ENTRY OF ORDER

) Judge: Hon. Richard H. DuBois

) Dept: 16

) Date Action Filed: June 5, 2018

1 TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on August 30, 2018, the Court entered the
3 Stipulation and Order Consolidating Related Actions and Related Matters, a true and correct
4 copy of which is attached hereto as Exhibit A.

5 DATED: August 31, 2018

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25 Additional counsel for Plaintiff Vladi Zakinov

26 1292660
27
28

DECLARATION OF SERVICE

I, the undersigned, declare:

1. That declarant is and was, at all times herein mentioned, a citizen of the United States and a resident of the County of San Diego, over the age of 18 years, and not a party to or interest in the within action; that declarant's business address is 600 B Street, Suite 1900, San Diego, California 92101.

2. That on August 31, 2018, I served the following document(s):

NOTICE OF ENTRY OF ORDER

— By transmitting via facsimile the document(s) listed above to the fax number(s) set forth on the attached Service List from fax number (619) 525-3991 on this date before 5:00 p.m. The facsimile transmission was reported as complete and without error.

X By placing the document(s) listed above in a United States mailbox at San Diego, California in a sealed envelope with postage thereon fully prepaid and addressed to the parties listed on the attached Service List.

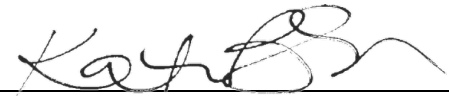
— By causing the document(s) listed above to be served by a courier service on the following parties:

— By depositing in a box or other facility regularly maintained by UPS, an express service carrier, or delivered to a courier or driver authorized by said express service carrier to receive documents, in an envelope designated by the said express service carrier, with delivery fees paid or provided for, addressed to the parties on the attached Service List.

— Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I sent the documents described herein to the persons at the e-mail addresses on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

3. That there is a regular communication by mail between the place of mailing and the places so addressed.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this August 31, 2018, at San Diego, California.



KATHERINE B. SCHEELE

In re Ripple Labs Inc. Litigation, Lead Case No. 18CIV02845

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II, LLC, and Bradley Garlinghouse*

EXHIBIT A

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Attorneys for Plaintiffs
 Vladi Zakinov and David Oconer

[Additional counsel appear on signature page]

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN MATEO

VLADI ZAKINOV, Individually and on
 Behalf of All Others Similarly Situated,

Plaintiff,

v.

RIPPLE LABS INC., XRP II, LLC,
 BRADLEY GARLINGHOUSE, and DOES
 1-25, Inclusive,

Defendants.

DAVID OCONER, Individually and on
 Behalf of All Others Similarly Situated,

Plaintiff,

v.

RIPPLE LABS INC., XRP II, LLC,
 BRADLEY GARLINGHOUSE, and DOES
 1-25, Inclusive,

Defendants.

FILED
SAN MATEO COUNTY

AUG 30 2018

Clerk of the Superior Court
 By

DEPUTY CLERK

Case No. 18-CIV-02845

CLASS ACTION

STIPULATION AND [PROPOSED]
 ORDER CONSOLIDATING RELATED
 ACTIONS AND RELATED MATTERS

Judge: Richard H. DuBois

Dept: 16

Date Action Filed: June 5, 2018

Case No. 18-CIV-03332

18 - CIV - 02845
 SO
 Stipulation & Order
 1352929



Judge: Robert D. Foiles

Dept: 21

Date Action Filed: June 27, 2018

[illegible]

RECEIVED
SAN MATEO COUNTY
AUG 28 2018
Clerk of the Superior Court

1. The above-captioned actions pending in this Court (the "Related Actions") make substantially the same allegations against defendant Ripple Labs Inc. ("Ripple" or the "Company"), XRP II, LLC, and Bradley Garlinghouse.

2. In an effort to assure consistent rulings and decisions and the avoidance of unnecessary duplication of effort, counsel for the respective parties in the Related Actions hereby enter into this Stipulation and [Proposed] Order Consolidating Related Actions and Related Matters (the "Stipulation").

3. Counsel for the parties to this Stipulation include Robbins Arroyo LLP ("Robbins Arroyo") and Robbins Geller Rudman & Dowd LLP ("Robbins Geller") on behalf of plaintiff Vladi Zakinov; Robbins Arroyo on behalf of David Oconer (collectively, "Plaintiffs"); Skadden, Arps, Slate, Meagher & Flom LLP and Debevoise & Plimpton LLP on behalf of defendants Ripple Labs, Inc., XRP II, LLC, and Bradley Garlinghouse (collectively, "Defendants").

4. The parties agree that it would be duplicative and wasteful of the Court's resources for Defendants named in the Related Actions to have to respond to the individual complaints prior to the agreed upon consolidation and in light of the anticipated filing of a consolidated complaint. Therefore, the parties agree that Defendants need not respond to the individual complaints that have already been filed in this Court.

5. On August 8, 2018, the Zakinov action was designated as complex. On August 21, 2018, it was assigned to the Honorable Richard H. DuBois, Department 16, for all purposes. A complex case status conference in the Oconer action is set for August 29, 2018.

CONSOLIDATION

6. The following Related Actions are hereby consolidated for all purposes, including pre-trial proceedings and trial (the "Consolidated Action"):

<u>Abbreviated Case Name</u>	<u>Case Number</u>	<u>Date Filed</u>
<i>Zakinov v. Ripple Labs Inc.</i>	18-CIV-02845	6/5/2018
<i>Oconer v. Ripple Labs Inc.</i>	18-CIV-03332	6/27/2018

Every pleading filed in the Consolidated Action, or in any separate action included herein, shall bear the following caption:

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN MATEO

IN RE RIPPLE LABS INC. LITIGATION)	Lead Case No. 18-CIV-02845
)	(Consolidated with Case No. 18-CIV-03332)
This Document Relates To:)	
ALL ACTIONS.)	<u>CLASS ACTION</u>
)	
)	

7. The files of the Consolidated Action shall be maintained in one file under Master File No. 18-CIV-02845.

8. Plaintiffs shall either designate a complaint as operative or file a Consolidated Complaint ("Consolidated Complaint") within 45 days after entry of this order, unless otherwise agreed upon by the parties. If filed, the Consolidated Complaint shall be the operative complaint and shall supersede all complaints filed in any of the actions consolidated herein. Defendants shall respond to the operative complaint or Consolidated Complaint within 45 days after service, unless otherwise agreed by the parties. In the event that Defendants file any motions directed at the operative complaint or Consolidated Complaint, the opposition and reply briefs shall be filed within 45 and 20 days, respectively, of the motions, unless otherwise agreed upon by the parties. Counsel agrees to confer to select a hearing date.

APPOINTMENT OF A LEADERSHIP STRUCTURE

9. The Plaintiffs agree that Robbins Arroyo and Robbins Geller shall serve as Co-Lead Counsel for Plaintiffs ("Co-Lead Counsel") in the Consolidated Action, and Defendants take no position on the Court's appointment of Co-Lead Counsel for Plaintiffs or the responsibilities assumed by that Co-Lead Counsel.

10. Plaintiffs agree that Co-Lead Counsel shall have sole authority to speak for Plaintiffs in matters regarding pre-trial procedure, trial, and settlement and shall make all work

1 assignments in such manner as to facilitate the orderly and efficient prosecution of the
2 Consolidated Action and to avoid duplicative or unproductive effort.

3 11. Plaintiffs agree that Co-Lead Counsel shall be responsible for coordinating all
4 activities and appearances on behalf of Plaintiffs. No motion, request for discovery, or other
5 pre-trial or trial proceedings shall be initiated or filed by any Plaintiff except through Co-Lead
6 Counsel.

7 12. Plaintiffs agree that Co-Lead Counsel shall be available and responsible for
8 communications to and from this Court, including distributing orders and other directions from
9 the Court to counsel, and shall be responsible for communication with Defendants' counsel on
10 matters of case administration and scheduling. Co-Lead Counsel shall further be responsible for
11 creating and maintaining a master service list of all parties and their respective counsel.

12 13. Defendants' counsel may rely upon all agreements made with Co-Lead Counsel,
13 or other duly authorized representative of Co-Lead Counsel, and such agreements shall be
14 binding on all Plaintiffs.

15 **RELATED MATTERS**

16 14. This Order shall apply to each case, arising out of the same or similar
17 transactions and/or events as the Related Actions which is currently pending in, subsequently
18 filed in, remanded to, or transferred to this Court.

19 15. When a case which properly belongs as part of the *In re Ripple Labs Inc.*
20 *Litigation*, Lead Case No. 18-CIV-02845, is hereafter or has been filed in, remanded to, or
21 transferred to this Court, counsel for the parties shall call such filing, remand, or transfer to the
22 attention of the clerk of this Court for purposes of moving the Court for an order consolidating
23 such case(s) with *In re Ripple Labs Inc. Litigation*, Lead Case No. 18-CIV-02845. Counsel for
24 the parties will further assist in assuring that counsel for the parties in such subsequent action(s)
25 receive notice of this Order.

1 IT IS SO STIPULATED.

2 DATED: 8/22/18

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STEPHEN J. ODDO
ERIC M. CARRINO


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Proposed Co-Lead Counsel for Plaintiffs and
Counsel for Plaintiffs Vladi Zakinov and
David Oconer

12 DATED: 8/22/18

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Additional counsel for Plaintiff Vladi Zakinov

1 DATED:

8/22/18

SKADDEN, ARPS, SLATE, MEAGHER
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Peter Morrison / by permission
SPD

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Counsel for defendants Ripple Labs Inc., XRP
II, LLC, and Bradley Garlinghouse

1286406

ORDER

The above Stipulation Consolidating Related Actions and Related Matters having been considered, and good cause appearing therefore,

IT IS SO ORDERED.

DATED:

8-29-18



HONORABLE RICHARD H. DUBOIS
JUDGE OF THE SUPERIOR COURT

DECLARATION OF SERVICE

I, the undersigned, declare:

1. That declarant is and was, at all times herein mentioned, a citizen of the United States and a resident of the County of San Diego, over the age of 18 years, and not a party to or interest in the within action; that declarant's business address is 600 B Street, Suite 1900, San Diego, California 92101.

2. That on August 23, 2018, I served the following document(s):

STIPULATION AND [PROPOSED] ORDER CONSOLIDATING RELATED ACTIONS AND RELATED MATTERS

By transmitting via facsimile the document(s) listed above to the fax number(s) set forth on the attached Service List from fax number (619) 525-3991 on this date before 5:00 p.m. The facsimile transmission was reported as complete and without error.

X By placing the document(s) listed above in a United States mailbox at San Diego, California in a sealed envelope with postage thereon fully prepaid and addressed to the parties listed on the attached Service List.

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Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I sent the documents described herein to the persons at the e-mail addresses on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

3. That there is a regular communication by mail between the place of mailing and the places so addressed.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this August 23, 2018, at San Diego, California.



KATHERINE B. SCHEELE

Zakinov v. Ripple Labs Inc., et al., Case No. 18CIV02845;
Oconer v. Ripple Labs Inc., et al., Case No. 18CIV03332

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